

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

GREAT LAKES INSURANCE SE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. CIV-22-702-JD
FREDY VALLE d/b/a VALLE	)	
TRUCKING;	)	
SILVER STAR CONSTRUCTION	)	
COMPANY, INC.;	)	
TYLON MACKEY;	)	
ISRAEL JUAREZ;	)	
ORD TRUCKING, INC.;	)	
ZURICH AMERICAN INS. CO.,	)	
	)	
Defendants.	)	
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ZURICH AMERICAN INS. CO.	)	
	)	
Third-Party Plaintiff,	)	
	)	
BERKSHIRE HATHAWAY	)	
HOMESTATE INS. CO., and	)	
PROGRESSIVE NORTHERN	)	
INS. CO.	)	
	)	
Third-Party Defendants.	)	

**DEFENDANT ORD TRUCKING INC.'S ANSWER**

COMES NOW Defendant ORD Trucking, Inc., and for its Answer to Plaintiff's Complaint [Doc. 1] and Disclaimer of Interest states as follows:

1. Defendant is without sufficient information to admit or deny Paragraphs 1, 2, 4, 5, 6, and 7 of the Complaint.
2. Defendant admits Paragraph 3 of Plaintiff's Complaint.

3. Defendant does not challenge the jurisdiction of the Court or that venue is proper in the Western District of Oklahoma.
4. Defendant admits that Paragraph 10 of Plaintiff's Complaint generally sets forth the state court Lawsuit allegations. Defendant, however, denies such state court Lawsuit allegations.
5. Defendant is without sufficient information to admit or deny Paragraphs 11, 12, 13, 14, 15, and 16 of the Complaint.
6. Defendant is without sufficient information to admit or deny Paragraphs 17, 18, 19, 20, 21, and 22 of the Complaint.
7. Defendant is without sufficient information to admit or deny Paragraph 23 of the Complaint.
8. Defendant denies the allegations contained in the last sentence of Paragraph 24 of the Complaint. Defendant is without sufficient information to admit or deny all other allegations contained in Paragraph 24 of the Complaint.
9. Defendant is without sufficient information to admit or deny Paragraphs 25, 26, and 27.
10. Paragraphs 28, 29, 30, 31, and 32 of the Complaint call for legal conclusions that require knowledge of facts and/or law not possessed by this Defendant.
11. Paragraphs 33a. – 33c. of the Complaint call for legal conclusions that require knowledge of facts and/or law not possessed by this Defendant.

#### **REQUEST FOR RELIEF**

Defendant Ord Trucking, Inc., desires to take no action regarding the coverage issue(s) presented in this declaratory judgment action and seeks to be dismissed from the action. To the extent coverage is afforded under the policies at issue and to the extent this Defendant qualifies or may qualify as an insured or is otherwise entitled to indemnity and/or defense under the policies

at issue, Defendant does not waive and hereby preserves all rights it may have under any such policy(ies) of insurance.

/s/ Rodney D. Stewart  
Rodney D. Stewart  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 4, 2023, I electronically transmitted the attached document to the Clerk of Court using Electronic Case Filing System for filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

/s/ Rodney D. Stewart  
Rodney D. Stewart